

EXHIBIT A

JAE LEE LAW, P.C.
2050 Center Avenue, Suite 120
Fort Lee, NJ 07024
Telephone No.: (201) 346-3800
Facsimile No.: (201) 346-3822
New Jersey Attorney ID: 038541992
Attorneys for plaintiff, *Elaine Lim*

ELAINE LIM,

Plaintiff,

vs.

STOP & SHOP NEW YORK METRO, COCA-
COLA REFRESHMENTS USA INC., "JOHN
DOES 1-5", and "ABC COMPANIES 1-5",

(both being fictitious designations),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY

DOCKET NO.: BER-L-3587-17

CIVIL ACTION

SUMMONS

THE STATE OF NEW JERSEY, TO THE ABOVE NAMED DEFENDANT(S):

Coca-Cola Refreshments USA Inc.

THE PLAINTIFF, named above has filed a lawsuit against you in the Superior Court of New Jersey. The Complaint attached to this Summons states the basis for this lawsuit. If you dispute this Complaint, you or your attorney must file a written Answer or Motion and proof of Service with the deputy clerk of the Superior Court in the County listed above within 35 days from the date you received this Summons, not counting the date you received it. If the Complaint is one in foreclosure, then you must file your written Answer or Motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, CN-971, Trenton, NJ 08625. A \$135.00 filing fee payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your Answer or Motion when it is filed. You must also send a copy of your Answer or Motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written Answer or Motion (with fee and complete case Information Statement), if you want the Court to hear your defense.

If you do not file and serve a written Answer or Motion within 35 days, the Court may enter a Judgment against you for the relief of plaintiff's demands, plus interest and costs of suit. If judgment is entered against you the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford to pay an attorney, you may call the Legal Services Office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling the Lawyer Referral Services. A list of these numbers is also provided.

/s/ Donald F. Phelan, Clerk
DONALD F. PHELAN, CLERK

Dated: May 30, 2017

Name and Address of Defendant:

Coca-Cola Refreshments USA Inc.
2500 Windy Ridge Parkway
Atlanta, GA 30339

JAE LEE LAW, P.C.
2050 Center Avenue, Suite 120
Fort Lee, NJ 07024
Telephone No.: (201) 346-3800
Facsimile No.: (201) 346-3822
New Jersey Attorney ID: 038541992
Attorneys for plaintiff, *Elaine Lim*

SUPERIOR COURT BERGEN COUNTY
FILED

MAY 22 2017

Laura A. Limbachi
DEPUTY CLERK

ELAINE LIM,

Plaintiff,

vs.

STOP & SHOP NEW YORK METRO,
COCA-COLA REFRESHMENTS USA INC.,
"JOHN DOES 1-5", and "ABC COMPANIES
1-5",
(both being fictitious designations),

Defendants.

: SUPERIOR COURT OF NEW JERSEY
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: CIVIL ACTION

COMPLAINT and JURY DEMAND

Plaintiff, Elaine Lim, residing at 46 Ryerson Place, in Borough of Closter, County of Bergen, State of New Jersey, by way of Complaint against the Defendants, says:

FIRST COUNT

1. On or about August 18, 2016, the Plaintiff, Elaine Lim, was lawfully upon the premises located at Stop & Shop, on 400 Demarest Avenue, in the Borough of Closter, County of Bergen, and State of New Jersey.

2. At the aforesaid time and place, the premises was owned, operated, maintained and/or controlled, as owner, landlord, lessee and/or lessor by the Defendants, Stop & Shop New York Metro; Coca-Cola Refreshments USA Inc., "John Does 1-5" and/or "ABC Companies 1-5",

(fictitious names for individuals whether individually, partnerships or corporations who may be responsible).

3. At the aforesaid time and place, the Defendants, Stop & Shop New York Metro, Coca-Cola Refreshments USA Inc., "John Does 1-5" and/or "ABC Companies 1-5" (fictitious names for individuals whether individually, partnerships or corporations who may be responsible), through its agents, servants, and/or employees had a duty to Plaintiff and persons such as Plaintiff, to keep and maintain the premises in a safe and proper condition and free and clear of any and all hazardous and dangerous conditions and disrepairs which would endanger the safety of Plaintiff and person such as Plaintiff.

4. At the aforesaid time and place, the Defendants so negligently and carelessly owned, operated, maintained and/or controlled the subject premises in such a way so as to cause the Plaintiff, Elaine Lim, to become injured due to the presence of a hazardous and dangerous condition on such premises.

5. The Defendants above disregarded its duty aforesaid and negligently and carelessly allowed its premises to be improperly, dangerously and palpably unreasonably maintained and to remain in an unsafe and dangerous condition in allowing said hazardous and dangerous condition to exist on its premises, all of which the defendants had due notice or by reasonable inspection thereof, would have had due notice.

6. That at all times hereinafter mentioned, the said Defendants had actual notice and/or constructive notice of said hazardous and dangerous condition and/or by reasonable inspection thereof, would have had due notice of the hazardous and dangerous condition existing.

7. As a result of the aforesaid carelessness and negligence of Defendants, the Plaintiff suffered severe and permanent injuries; was disabled and disfigured; has suffered and will continue to suffer great pain and torment, both mental and physical.

8. As a further result of Defendants' aforesaid negligence and the injuries thereby caused to the Plaintiff, the Plaintiff has been and will be in the future compelled to spend great and diverse sums of money for medical aid and treatment, and has been and will be prevented from attending to the usual occupation, duties, activities and business.

SECOND COUNT

1. The Plaintiff repeats and allegations of the First Count of the Complaint as if set forth at length herein.

2. Plaintiff reserves the right to amend the Complaint to substitute the names of the actual business entity or individual for the fictitious names "John Does 1-5", and/or "ABC Companies 1-5", (fictitious names for individuals whether individually, partnerships or corporations who may be responsible), should it be determined that other persons or entities are responsible for the condition which caused the incident complained of.

WHEREFORE, Plaintiff, Elaine Lim, demands judgment against Defendants, Stop & Shop New York Metro, Coca-Cola Refreshments USA Inc., "John Does 1-5" and "ABC Companies 1-5", (fictitious names for individuals whether individually, partnerships or corporations who may be responsible), for damages, together with interest and costs of suit.

DEMAND FOR DISCOVERY OF INSURANCE COVERAGE

Pursuant to New Jersey Court Rule 4:10-2(b), demand is made that defendant disclose to plaintiff's attorney whether or not there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or indemnify or reimburse for payments made to satisfy the judgment and provide plaintiff's attorney with true copies of those insurance agreements or policies, including, but not limited to, any and all declaration sheets. This demand shall include and cover not only primary coverage, but also any and all excess, catastrophe and umbrella policies.

DEMAND TO ANSWER FORM C AND C(2) INTERROGATORIES

Pursuant to Civil Practice Rule 4:17-1 et seq., Uniform Form C and C(2) Interrogatories are hereby deemed served upon the defendants herein simultaneous with service of the defendants' answer to the Complaint.

JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

DESIGNATION of TRIAL COUNSEL

Pursuant of Rule 4:5-1(c), Martin S. Cedzidlo is hereby designated as Trial Counsel.

CERTIFICATION

I hereby certify that this matter is not the subject of any other action pending in any court or arbitration proceeding, that no such other action or arbitration proceeding is contemplated by this plaintiff, and that there are no other parties, whom, to the knowledge of the plaintiff(s)' counsel, should be joined in this action.




I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Jae E. Lee

Date: May 15, 2017

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS) Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule 4:5-1</i> Pleading will be rejected for filing, under <i>Rule 1:5-6(c)</i>, if information above the black bar is not completed or attorney's signature is not affixed		FOR USE BY CLERK'S OFFICE ONLY	
			PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA	
			CHG/CK NO.	
			AMOUNT:	
			OVERPAYMENT:	
		BATCH NUMBER:		
ATTORNEY/PRO SE NAME Jae E. Lee, Esq.		TELEPHONE NUMBER (201) 346-3800		COUNTY OF VENUE Bergen
FIRM NAME (if applicable) JAE LEE LAW, P.C.		DOCKET NUMBER (when available) BER-L- 3587-17		
OFFICE ADDRESS 2050 Center Avenue, Suite 120 Fort Lee, NJ 07024		DOCUMENT TYPE Complaint		
		JURY DEMAND <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		
NAME OF PARTY (e.g., John Doe, Plaintiff) Elaine Lim - Plaintiff		CAPTION Elaine Lim v. Stop & Shop New York Metro, et. al.		
CASE TYPE NUMBER (See reverse side for listing) 605	HURRICANE SANDY RELATED? <input type="checkbox"/> YES <input type="checkbox"/> NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.		
RELATED CASES PENDING? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, LIST DOCKET NUMBERS		
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) <input type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN		
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.				
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION				
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS		
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION Plaintiff sustained serious and permanent injuries as a result of an incident.				
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION		
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, FOR WHAT LANGUAGE?		
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with <i>Rule 1:38-7(b)</i> .				
ATTORNEY SIGNATURE: 				

Side 2



CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under Rule 4:5-1

CASE TYPES (Choose one and enter number of case type in appropriate space on the reverse side.)**Track I - 150 days' discovery**

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 999 OTHER (briefly describe nature of action)

Track II - 300 days' discovery

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT - OTHER

Track III - 450 days' discovery

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

Track IV - Active Case Management by Individual Judge / 450 days' discovery

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

Multicounty Litigation (Track IV)

- | | |
|--|---|
| 271 ACCUTANE/ISOTRETINOIN | 292 PELVIC MESH/BARD |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 293 DEPUY ASR HIP IMPLANT LITIGATION |
| 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL | 295 ALLODERM REGENERATIVE TISSUE MATRIX |
| 282 FOSAMAX | 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS |
| 285 STRYKER TRIDENT HIP IMPLANTS | 297 MIRENA CONTRACEPTIVE DEVICE |
| 286 LEVAQUIN | 299 OLMESARTAN MEDOXOMIL MEDICATIONS/BENICAR |
| 287 YAZ/YASMIN/OCELLA | 300 TALC-BASED BODY POWDERS |
| 289 REGLAN | 601 ASBESTOS |
| 290 POMPTON LAKES ENVIRONMENTAL LITIGATION | 623 PROPECIA |
| 291 PELVIC MESH/GYNECARE | |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category

☐ Putative Class Action☐ Title 59

BERGEN COUNTY COURTHOUSE
SUPERIOR COURT LAW DIV
BERGEN COUNTY JUSTICE CTR RM 415
HACKENSACK NJ 07601-7680

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (201) 527-2600
COURT HOURS 8:30 AM - 4:30 PM

DATE: MAY 24, 2017
RE: LIM VS STOP & SHOP NEW YORK METRO
DOCKET: BER L -003587 17

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON CHARLES E. POWERS

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 003
AT: (201) 527-2600.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: JAE E. LEE
JAE LEE LAW PC
2050 CENTER AVENUE
STE 120
FORT LEE NJ 07024

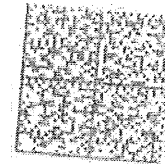
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 **JAELEE LAW, P.C.**
ATTORNEYS AT LAW

2050 Center Avenue, Suite 120
Fort Lee, NJ 07024

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JUN 14 2017



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Coca-Cola Refreshments USA, Inc.
2500 Windy Ridge Parkway
Atlanta, GA 30339

Legal F2

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